

1 The Honorable Christopher M. Alston
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UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

In re
JASON L. WOEHLER,
Debtor. | Case No. 18-12299-CMA
*EX PARTE STIPULATED MOTION
FURTHER EXTENDING TIME TO OBJECT
TO DISCHARGE OR MOVE TO DISMISS*

Acting United States Trustee for Region 18, Gregory M. Garvin (“U.S. Trustee”), and the chapter 7 debtor herein, Jason L. Woehler (“Debtor”), by and through Debtor’s undersigned counsel, hereby stipulate to entry of an Order extending the deadline for filing an objection to the Debtor’s discharge under § 727 and/or § 707(b)(3) of the Bankruptcy Code for the United States Trustee and the chapter 7 trustee only.

In the course of reviewing this case for purposes of 11 U.S.C. §§ 707(b) and 727, the United States Trustee requested that the Debtor produce information and documentation by Wednesday, December 19, 2018 and appear for examination under oath on December 20, 2018. The Debtor requested additional time to provide the requested documents, which made rescheduling the examination necessary. The parties previously stipulated to an extension of the discharge objection deadline to address that. Subsequently, the U.S. Trustee’s Office was closed during a lapse in government funding, and it did not reopen until January 28, 2019. The chapter 7 trustee obtained another extension of the discharge objection deadline during that time, and the deadline is currently February 11, 2019.

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DISMISS - 1*

Office of the United States Trustee
United States Courthouse
700 Stewart Street, Suite 5103
Seattle, WA 98101-1271
206-553-2000, 206-553-2566 (fax)

The Debtor has still not produced all documents in response to the U.S. Trustee's subpoena having a due date of December 19, 2018, but has instead requested, through counsel, that the discharge objection deadline be further extended for six months. The U.S. Trustee assents to a further extension, as that will afford time to address the Debtor's failure to produce documents—including by litigating a motion to compel if necessary—and to examine the Debtor under oath after all subpoenaed documents are produced. The U.S. Trustee only requests a three-month extension rather than the six-month extension proposed by the Debtor. The parties accordingly stipulate to an extension of the deadline, from February 11, 2019 to and through May 11, 2019, and respectfully request that the Court enter an order extending the deadline to that date.

A stipulated proposed order will be submitted herewith, extending the deadline to move to dismiss this case under section 707(b)(3) or to object to the discharge under section 727, for the United States Trustee and the chapter 7 trustee only, to and through May 11, 2019.

DATED this 11th day of February, 2019.

Respectfully submitted,

GREGORY M. GARVIN
Acting United States Trustee for Region 18

/s/ Hilary Bramwell Mohr
HILARY BRAMWELL MOHR, WSBA #40005
Attorney for the United States Trustee

JAMES E. DICKMEYER, P.C.

/s/ James E. Dickmeyer [authorized by email]
JAMES E. DICKMEYER, WSBA #14318
Attorney for the Debtor

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